

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

---

In re:

The Diocese of Buffalo, New York

Debtor.

Case No. 20-10322 (CLB)

Chapter 11

---

**NOTICE OF FILING**

---

**PLEASE TAKE NOTICE** that, in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [Docket No. 362], Burns Bair LLP has filed the *Monthly Fee Statement of Burns Bair LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Insurance Counsel to the Official Committee of Unsecured Creditors of the Diocese of Buffalo, New York, for the Period May 1, 2025 through May 31, 2025*, a copy of which is attached hereto and hereby served upon you.

Dated: June 26, 2025

**BURNS BAIR LLP**

/s/ Jesse J. Bair

Jesse J. Bair (admitted *pro hac vice*)

Timothy W. Burns (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: jlbair@burnsbair.com

Email: tburns@burnsbair.com

*Special Insurance Counsel to the Official Committee of  
Unsecured Creditors of the Diocese of Buffalo, New York*

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

---

In re:

The Diocese of Buffalo, New York

Debtor.

Case No. 20-10322 (CLB)

Chapter 11

---

**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL  
INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF THE DIOCESE OF BUFFALO, NEW YORK, FOR THE PERIOD  
MAY 1, 2025 THROUGH MAY 31, 2025**

---

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors of the Diocese of Buffalo, New York</u>
Date of Retention:	<u>Effective October 5, 2023, pursuant to Order entered November 13, 2023 [Docket No. 2606]</u>
Period for which compensation and reimbursement is sought:	<u>May 1, 2025 through May 31, 2025</u>
Amount of compensation sought as actual, reasonable, and necessary:	<u>80% of \$34,070.00 (\$27,256.00)</u>
Amount of expense reimbursement sought as actual, reasonable, and necessary:	<u>\$3,345.58</u>

This is a: X monthly \_\_\_ quarterly \_\_\_ final application.

This is Burns Bair LLP's nineteenth monthly fee statement in this case.

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
the Diocese of Buffalo**

**Issue Date :** 6/26/2025

**Bill # :** 01956

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2025	Jesse Bair	Review and respond to correspondence with state court counsel re Arrowood liquidation issues (.1);	0.10	\$70.00
5/1/2025	Brian Cawley	Respond to J. Bair questions regarding Arrowood coverage (.2);	0.20	\$110.00
5/2/2025	Jesse Bair	Participate in call with I. Scharf re case developments, upcoming mediation session, and related insurance strategy (.2);	0.20	\$140.00
5/5/2025	Timothy Burns	Participate in BB team conference re upcoming insurance mediation sessions and strategy in connection with same (.1);	0.10	\$70.00
5/5/2025	Brian Cawley	Participate in BB team conference re upcoming insurance mediation sessions and strategy in connection with same (.1);	0.10	\$55.00
5/5/2025	Jesse Bair	Participate in BB team conference re upcoming insurance mediation sessions and strategy in connection with same (.1);	0.10	\$70.00
5/6/2025	Jesse Bair	Participate in conference with B. Cawley and T. Burns re preparations for upcoming mediation session (.1);	0.10	\$70.00
5/6/2025	Jesse Bair	Review draft insurance section of the Committee's opposition brief to Catholic Mutual's motion to reinstate the stay (.1); review B. Cawley summary re outcome of state court counsel meeting re mediation issues (.1);	0.20	\$140.00
5/6/2025	Timothy Burns	Participate in conference with J. Bair and B. Cawley re mediation strategy and preparations (.1); review B. Cawley's summary re outcome of state court counsel meeting (.1);	0.20	\$140.00
5/6/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re mediation issues (.3); draft email memo re outcome of meeting and next-steps (.2);	0.50	\$275.00
5/8/2025	Brian Cawley	Participate in portion of Zoom mediation session for insurance purposes (1.7);	1.70	\$935.00

5/8/2025	Timothy Burns	Review and respond to correspondence with PSZJ re insurers' counter (.2); review and respond to correspondence with J. Bair re mediation issues (.2); conferences with J. Bair re mediation session outcome (.1);	0.50	\$350.00
5/8/2025	Jesse Bair	Prepare for insurance mediation session, including reviewing most recent counter received from the insurers (.2); participate in portion of insurance mediation session (2.5); participate in conference with T. Burns re mediation session outcome (.1);	2.80	\$1,960.00
5/9/2025	Jesse Bair	Participate in portion of day 2 of mediation session for insurance purposes (1.2); participate in conference with T. Burns re outcome of mediation session and next-steps (.2);	1.40	\$980.00
5/9/2025	Jesse Bair	Review Catholic Mutual's letter re withdrawal of motion to reinstate the stay (.1);	0.10	\$70.00
5/9/2025	Brian Cawley	Participate in portion of day 2 of mediation session for insurance purposes (.8);	0.80	\$440.00
5/9/2025	Timothy Burns	Participate in conference with J. Bair re outcome of day 2 of mediation session (.2); review correspondence with PSZJ re mediation issues (.1);	0.30	\$210.00
5/12/2025	Timothy Burns	Conference with I. Scharf re mediation (.3); conference with J. Bair re same (.2); review and respond to I. Scharf's email to professionals re insurer exposure and mediation (.2);	0.70	\$490.00
5/12/2025	Timothy Burns	Review Catholic Mutual's letter to Judge Bucki re withdrawal of motion re partial reinstatement of stay (.1);	0.10	\$70.00
5/12/2025	Jesse Bair	Analysis re insurance mediation offers and related developments (.2); review and respond to correspondence with state court counsel and Committee professionals re same (.2);	0.40	\$280.00
5/12/2025	Brian Cawley	Respond to T. Burns request regarding case insurance summary (.2);	0.20	\$110.00
5/13/2025	Jesse Bair	Analyze claim and coverage issues in connection with formulating response to the insurers' latest mediation positions (.3);	0.30	\$210.00
5/13/2025	Jesse Bair	Prepare for meeting with Committee professionals re insurance mediation strategy (.2); participate in meeting with Committee professionals re insurance mediation strategy and potential responses to latest insurer positions (.6);	0.80	\$560.00
5/13/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation developments and next-steps (.6);	0.60	\$420.00

5/13/2025	Timothy Burns	Prepare for call with Committee professionals re insurers' counter (.5); participate in call with Committee professionals re insurers' counter, preparation of response, and overall insurance strategy (.6); participate in state court counsel meeting for insurance purposes re mediation developments and next-steps (.6); review and respond to I. Scharf correspondence with state court counsel re mediation issues (.2); review and respond to correspondence with state court counsel re mediation insurance analysis (.2);	2.10	\$1,470.00
5/14/2025	Timothy Burns	Review correspondence with I. Scharf and the Committee re mediation (.1);	0.10	\$70.00
5/14/2025	Timothy Burns	Review materials from PSZJ re parish and diocesan insurer information (.2);	0.20	\$140.00
5/14/2025	Timothy Burns	Review correspondence between BB and PSZJ re mediation analysis conference (.1);	0.10	\$70.00
5/14/2025	Timothy Burns	Review correspondence with the Committee and state court counsel re insurance information for mediation (.2);	0.20	\$140.00
5/14/2025	Brian Cawley	Analyze and draft summary of parish insurers in connection with ongoing mediation negotiations (.9);	0.90	\$495.00
5/14/2025	Brian Cawley	Correspond with state court counsel re upcoming Arrowood bar date, including providing revised instructions in connection with same (.3);	0.30	\$165.00
5/14/2025	Jesse Bair	Detailed review of parish policy information in connection with ongoing mediation negotiations (.5);	0.50	\$350.00
5/14/2025	Jesse Bair	Review various insurance questions from state court counsel in connection with ongoing mediation and draft revised email memo answering same (.8);	0.80	\$560.00
5/15/2025	Jesse Bair	Participate in conferences with T. Burns re insurance mediation developments and next-steps (.2);	0.20	\$140.00
5/15/2025	Brian Cawley	Respond to T. Burns request regarding case mediation materials (.2);	0.20	\$110.00
5/15/2025	Timothy Burns	Participate in conferences with J. Bair re insurance mediation developments and next-steps (.2);	0.20	\$140.00
5/15/2025	Timothy Burns	Review I. Scharf correspondence re mediation negotiation recommendation (.1);	0.10	\$70.00
5/15/2025	Timothy Burns	Conference with I. Scharf re outcome of call with the mediator (.2);	0.20	\$140.00
5/20/2025	Timothy Burns	Review BB internal correspondence re case developments and negotiations (.1);	0.10	\$70.00
5/20/2025	Jesse Bair	Review I. Scharf correspondence re case developments (.1);	0.10	\$70.00
5/21/2025	Jesse Bair	Participate in call with I. Scharf re mediation developments (.1);	0.10	\$70.00
5/22/2025	Karen Dempksi	Docket/calendar continued compensation hearing (.1);	0.10	\$30.00
5/22/2025	Timothy Burns	Prepare for mediation (.3); review and respond to correspondence with PSZJ re mediation issues (.2);	0.50	\$350.00

5/22/2025	Jesse Bair	Review agenda for upcoming mediation and conference with BB team re preparations for same (.2); correspond with I. Nasatir re call to discuss Catholic Mutual coverage issues (.1);	0.30	\$210.00
5/23/2025	Jesse Bair	Participate in conference with BB team re mediation preparations and Catholic Mutual coverage issues (.1);	0.10	\$70.00
5/23/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re Catholic Mutual coverage issues (.2);	0.20	\$140.00
5/23/2025	Brian Cawley	Participate in conference with T. Burns and J. Bair re Catholic Mutual coverage arguments and mediation preparations in connection with same (.1);	0.10	\$55.00
5/23/2025	Brian Cawley	Participate in call with PSZJ re Catholic Mutual coverage issues (.4); draft summary re relevant arguments, including associated legal research (.5);	0.90	\$495.00
5/23/2025	Timothy Burns	Review and analysis of arguments re coverage under Catholic Mutual policies (.8); conference with BB team re same (.1); correspond with B. Cawley re arguments and analysis re same (.2);	1.10	\$770.00
5/27/2025	Timothy Burns	Prepare for upcoming mediation session, including detailed review of claim and coverage assessments and related research memos (2.4);	2.40	\$1,680.00
5/27/2025	Brian Cawley	Analyze case materials, relevant coverage issues, and insurer exposures in preparation for mediation (.7);	0.70	\$385.00
5/27/2025	Jesse Bair	Develop revised insurer exposure assessments in advance of mediation session (.2); review BB correspondence re analysis of Catholic Mutual's sexual abuse exclusion argument (.1);	0.30	\$210.00
5/28/2025	Jesse Bair	Participate in call with T. Burns re outcome of insurance mediation session (.2);	0.20	\$140.00
5/28/2025	Brian Cawley	Participate in day 1 of mediation session (6.0);	6.00	\$3,300.00
5/28/2025	Timothy Burns	Participate in day 1 of mediation session for insurance purposes (6.0);	6.00	\$4,200.00
5/28/2025	Timothy Burns	Participate in call with J. Bair re outcome of day 1 of mediation session (.2); participate in post mediation session conference with I. Nasatir re case coverage issues and mediation negotiations (.2); participate in conference with state court counsel re same (.2);	0.60	\$420.00
5/29/2025	Timothy Burns	Review 85-86 Catholic Mutual policy in preparation for mediation (.5); prepare questions for Catholic Mutual for negotiation (.2); participate in day 2 of mediation session (7.0); participate in post-mediation discussion with state court counsel re session outcome and next-steps (.1); participate in call with J. Bair re same (.1);	7.90	\$5,530.00
5/29/2025	Brian Cawley	Participate in portion of day 2 of mediation session for insurance purposes (6.4);	6.40	\$3,520.00
5/29/2025	Jesse Bair	Participate in call with T. Burns re outcome of outcome of day 2 of mediation session (.1);	0.10	\$70.00
<b>Total Hours and Fees</b>			<b>52.80</b>	<b>\$34,070.00</b>

## EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/6/2025	Postage	\$4.38
5/27/2025	Delta Airlines, T. Burns (MSN-BUF May 27-29)	\$705.36
5/27/2025	United Airlines, B. Cawley (MSN-BUF, May 27-29)	\$705.36
5/27/2025	Taxi, T. Burns (airport to hotel)	\$52.00
5/27/2025	Hotel, T. Burns (2 nights)	\$800.80
5/27/2025	Travel meal, T. Burns	\$25.60
5/27/2025	Uber, B. Cawley (home to airport)	\$16.95
5/27/2025	Hotel, B. Cawley (2 nights)	\$800.80
5/28/2025	Uber, B. Cawley (airport to hotel)	\$37.09
5/28/2025	Travel meal, T. Burns	\$6.53
5/29/2025	Travel meal, T. Burns	\$22.98
5/29/2025	Airport parking, T. Burns	\$30.00
5/29/2025	Uber, B. Cawley and T. Burns (hotel to airport)	\$54.09
5/29/2025	Uber, B. Cawley (airport to home)	\$17.97
5/29/2025	Travel meal, T. Burns	\$36.10
5/29/2025	Travel meal, B. Cawley	\$29.57
<b>Total Expenses</b>		<b>\$3,345.58</b>

## Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian Cawley	Associate	19.00	\$550.00	\$10,450.00
Jesse Bair	Partner	9.80	\$700.00	\$6,860.00
Karen Dempski	Paralegal	0.10	\$300.00	\$30.00
Timothy Burns	Partner	23.90	\$700.00	\$16,730.00

**Total Due This Invoice: \$37,415.58**